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Investigation by the Department of Telecommunications)	
and Energy on its Own Motion, pursuant to G.L. c. 164,)	
§§ 1A(a), 1B(d), 94; and 220 C.M.R. §11.04, into the)	D.T.E. 03-88D
Costs that Should Be Included in Default Service Rates)	
for Fitchburg Gas and Electric Light Company)	
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6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term "Company" refers to Fitchburg Gas and Electric Light Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses within ten (10) calendar days from the date of issuance.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of Telecommunications
and Energy on its Own Motion, pursuant to G.L. c. 164,
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D.T.E. 03-88D

**ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS**

The following are the Attorney General's First Set of Document and Information Requests in the above captioned proceeding.

AG-FGE-1-1 Please provide the following monthly bad debt data for the period from January, 2001 through December, 2003. Please separate the data into default, standard offer, and delivery for each month.

- A. Bad debt written off.
- B. Bad debt recovered.
- C. Bad debt reserve balance 1/1/2001.
- D. Bad debt reserve monthly activity.
- E. Monthly Booked Revenue and net write offs for 1999 through 2003.

Please supply the data in an Excel spreadsheet file as well as in a paper version.

AG-FGE-1-2 Please provide the following monthly data for the period from January, 2001 through December, 2003.

- A. Monthly billed revenue by rate class (R1, R2 etc) by energy supply (default, standard offer, competitive).

- B. Monthly kwh by rate class (R1, R2 etc) by energy supply (default, standard offer, competitive).

Please supply the data in an Excel spreadsheet file as well as in a paper version.

- AG-FGE-1-3** Please provide the workpapers, backup, and calculations that support each overhead factor used in your filing. Are these factors use in other regulatory cases? Please supply all recent (since 2002) FGE testimony and workpapers with supporting backup including timesheets that use overhead factors. Explain their use in FGE cost accounting and any other applications where they are used. Please supply the data in an Excel spreadsheet file as well as in a paper version.
- AG-FGE-1-4** In the Ashbury Testimony, Schedule KMA-1, Page 5 of 6, Note 3, please provide the source for the formula for REC purchases. Please provide all REC invoices received to date.
- AG-FGE-1-5** In the Ashbury Testimony, Schedule KMA-1, Page 5 of 6, Note 3, please provide the REC amount expensed by FGE by month during 2003.
- AG-FGE-1-6** Please provide the monthly deferral balances for default service bad debt and separately for cash working capital from the first month that a deferral was made until December, 2003.
- AG-FGE-1-7** Please provide the amount collected in rates monthly since the initial month collected until December, 2003 for the supply and renewable energy certificate costs discussed in the Asbury Testimony, Page 3, Lines 15-17. Please provide the amounts charged to expense for each item during the same time period..
- AG-FGE-1-8** Please provide amounts, backup calculations, invoices and workpapers for all Alternative Compliance payments made to date. Identify Standard Offer and Default Service separately.

Dated: February 24, 2004